

# Federal Defenders OF NEW YORK, INC.

Southern District  
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April 15, 2021

**BY ECF**

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**Re: United States v. Zoilo Taveras  
20 Cr. 240 (PAE)**

Honorable Judge Engelmayer:

I write to request that the Court modify Mr. Taveras's bail conditions to allow him to apply for a Dominican passport at the Consulate of the Dominican Republic in New York, New York. Mr. Taveras's sentencing is currently scheduled for May 26. Mr. Taveras is a Dominican citizen, and he hopes to return to the Dominican Republic as early as possible after his sentence is imposed. In order to do so, Mr. Taveras would like to obtain a Dominican passport, with the condition that he keep this passport in his defense counsel's office and not use it until after his sentencing. The Government is in agreement with this request. Pretrial defers to the Government.

On April 1, 2020, Your Honor released Mr. Taveras on bail with the following conditions, *inter alia*: A \$20,000 personal recognizance bond co-signed by two FRPs; pre-trial supervision; travel limited to SNDY/EDNY; and home detention with electronic monitoring. On August 31, 2020, Your Honor imposed a curfew for Mr. Taveras. He has been fully compliant with all of the conditions of release.

If the Court grants this request, Mr. Taveras would apply for the Dominican passport at the Consulate of the Dominican Republic. When ready, the passport would either be mailed directly to the Federal Defenders Office or picked up by Mr. Taveras and an employee of the Federal Defenders. If picked up in person, the passport would remain in the possession of an employee of the Federal Defenders office and not in Mr. Taveras's possession. The passport would be kept in defense counsel's office until after sentencing. Assistant U.S. Attorney Brandon Harper is in agreement with Mr. Taveras's request.

Thank you for your consideration of this matter.

Respectfully Submitted,

/s/

Zawadi Baharanyi  
Assistant Federal Defender  
917-612-2753

**GRANTED.** The Clerk of Court is requested to terminate  
the motion at Dkt. No. 52.

4/16/2021

SO ORDERED.



PAUL A. ENGELMAYER  
United States District Judge